

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

ADAPTIVE SPECTRUM AND SIGNAL  
ALIGNMENT, INC.,

Plaintiff,

v.

AT&T ENTERPRISES, LLC, AT&T  
MOBILITY LLC, AT&T MOBILITY II  
LLC and AT&T SERVICES INC.,

Defendants.

Civil Action No.: 2:24-cv-00029-JRG-RSP

**JURY TRIAL DEMANDED**

**JOINT MOTION TO AMEND DOCKET CONTROL ORDER**

Plaintiff Adaptive Spectrum and Signal Alignment, Inc. (“ASSIA”) and Defendant AT&T Enterprises, LLC, AT&T Mobility LLC, AT&T Mobility II LLC, and AT&T Services Inc.’s (collectively “Defendants” or “AT&T”) (collectively, “the Parties”) respectfully request the Court extend the end of fact discovery and subsequent deadlines, as reflected in the Second Amended Docket Control Order attached hereto and would show the Court as follows:

Specifically, the Parties seek to extend the deadlines for (1) the Parties to Complete Fact Discovery and File Motions to Compel Discovery, from April 15, 2025 to May 13, 2025; (2) ASSIA to serve its Final Election of Asserted Claims pursuant to the Order Focusing Patent Claims and Prior Art to Reduce Costs, from April 15, 2025 to May 6, 2025; (3) the Parties to Exchange Privilege Logs, from April 22, 2025 to May 20, 2025; (4) AT&T to serve its Final Election of Asserted Prior Art pursuant to the Order Focusing Patent Claims and Prior Art to Reduce Costs, from April 29, 2025 to May 20, 2025; (5) the Parties to Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof, from April 29, 2025 to May 20, 2025; (6) the Parties to Serve Disclosures for Rebuttal Expert Witnesses, from May 27, 2025 to June

20, 2025; (7) the Parties to Complete Expert Discovery, from June 10, 2025 to July 1, 2025; (8) the Parties to File Dispositive Motions, from June 16, 2025 to July 8, 2025; (9) the Parties to File Motions to Strike Expert Testimony, from June 16, 2025 to July 8, 2025; (10) the Parties to Serve Pretrial Disclosures, from July 10, 2025 to July 15, 2025; (11) the Parties to Serve Objections to Pretrial Disclosures and Serve Rebuttal Pretrial Disclosures, from July 22, 2025 to July 28, 2025; (12) the Parties to Serve Objections to Rebuttal Pretrial Disclosures, from July 29, 2025 to August 4, 2025; and (13) the Parties to File Motions *in Limine*, from July 29, 2025 to August 1, 2025.

The Parties have good cause to extend the deadline to complete fact discovery. The parties discovered the scope of electronically stored information (ESI) discovery in this case is extensive and requires additional time for proper review and production. The parties have also encountered scheduling difficulties in securing witness availability within the current discovery window, making it impractical to complete necessary depositions and document exchanges within the deadline requirements provided in Dkt. No. 102. Given these challenges, the parties agree that a brief extension will promote efficiency and ensure a more complete factual record. Moreover, the schedule is consistent with the case, *Adaptive Spectrum and Signal Alignmen, Inc. v. Charter Communications, Inc.*, Case No. 2:24-cv-00124-JRG, that is co-pending before this Court.

This extension is not sought for prejudice or delay, but for good cause and so that justice may be served. The proposed schedule maintains the current trial date, but seeks to extend the other dates to provide the Parties with the time they need to complete fact and expert discovery and then comply with the remaining deadlines in the case.

The Parties met and conferred to discuss the proposed extensions of the deadlines

requested in this Motion and are jointly seeking the relief sought herein. Accordingly, the Parties respectfully request that the Court grant this Joint Motion and enter the proposed order attached hereto.

DATED: March 27, 2025

Respectfully submitted,

/s/ Bailey A. Blaies

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who have consented to electronic service on March 27, 2025. Local Rule CV-5(a)(3)(A).

/s/ Bailey A. Blaies

Bailey A. Blaies

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel has complied with the meet and confer requirements of Local Rule CV-7(g). Counsel for both parties discussed the issues presented here on March 27, 2025. Counsel for Defendant indicated that it was not opposed to the relief sought herein.

/s/ Bailey A. Blaies

Bailey A. Blaies